

PD-Q Recommendations - CNEP FY11 Clean Air Application Maria Martinez to: Elizabeth Braziel

07/22/2010 08:54 AM

Cc: Regina Krystyn, Mark Sather, Jim Afghani, Bill Nally, Anthony Talton

Elizabeth,

We recommend funding of the Cherokee Nation's FY11 ambient air monitoring workplan with the following modifications:

- Lead Monitoring: At this point in time, there is not a need for Cherokee Nation Stilwell (OK) NCore Pb monitoring - we recommend that no actions be taken by ITEC with regard to any NCore Pb monitoring. Technical information relevant to this recommendation: The nearest major potential lead source to the area of interest is the AES Shady Point Generation Plant (coal-fired), ~ 60 miles due south of Stilwell OK, with predominant winds from respective south/north during the summer/winter, with infrequent winds from the east. The nearest, limited, ODEQ Pb monitoring data is from Pryor OK (~100 miles to the northwest), with nanogram (~ 0.0025 ug/m3) Pb monitoring concentrations, which are generally similar to ITEC's/Kent's Pryor OK Pb monitoring concentrations from the same time period. Additionally, any required NCore monitoring in the final Pb reconsideration regulations (currently expected to signed in 12/2010), will not apply to Tribes.
- PM2.5 Monitoring: Cherokee Nation does not need to install a PM2.5 FEM BAM continuous monitor at the Roland site at this time.

Additional technical comments:

- ITEC Pb filter analysis \$69 while the Quapaw's Pb filter analysis = \$38. I do not see reference to air toxics monitoring or PM2.5 filter weighing in this workplan which could have accounted for the difference - request an explanation for the difference. Note that the original ITEC quote from IML was comparable to the Quapaw Tribal workplan, Pb analysis cost.
- Were portable ozone transfer standard audit analyzer, datalogger, and zero air generator purchased with FY10 grant?

Maria